

ORIGINAL

SEALED

AO 91 (Rev. 11/11) Criminal Complaint

UNITED STATES DISTRICT COURT

for the

District of Hawaii

FILED IN THE
UNITED STATES DISTRICT COURT
DISTRICT OF HAWAII

MAR 21 2019

United States of America
v.

Case No.

at 11 o'clock and 07 min. AM
SUE BEITIA, CLERK LS

ELVIS PRES LEE,

MAG. NO. 19-00280-RT

Defendant(s)

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of 03/03/19-03/20/19 in the county of Honolulu in the
9th District of Hawaii, the defendant(s) violated:

Code Section

18 U.S. Code §472

Offense Description

Uttering counterfeit obligations or securities

This criminal complaint is based on these facts:

See attached affidavit.

☒ Continued on the attached sheet.



Complainant's signature

USSS SA KARL VON ALLMEN

Printed name and title

Sworn to before me and signed in my presence.

Date: 03/21/2019

City and state: Honolulu, HI



Hon. Kevin S. Chang, U.S. Magistrate Judge

IN THE UNITED STATES DISTRICT COURT

FOR THE DISTRICT OF HAWAII

UNITED STATES OF AMERICA,)	MAG. NO. 19-00280-RT
)	
Plaintiff,)	AFFIDAVIT IN SUPPORT OF
)	CRIMINAL COMPLAINT
v.)	
)	
ELVIS PRES LEE,)	
)	
Defendant.)	

AFFIDAVIT IN SUPPORT OF CRIMINAL COMPLAINT

KARL VON ALLMEN, after being first duly sworn on oath, deposes and says as follows:

BACKGROUND

1. I am a Special Agent with the United States Secret Service assigned to the Honolulu Field Office in the District of Hawaii. I have served in this capacity since March 2018. Prior to my assignment to the Secret Service I served as a Virginia State Trooper for three years. As a Virginia State Trooper, I conducted investigations and made criminal arrests. I am familiar with the facts set forth in this affidavit, which are based on my personal knowledge, as well as information provided to me by other law enforcement personnel and/or witnesses. This affidavit contains only the information necessary to support probable cause. It is not intended to include each and every fact and matter observed or known to

the government.

STATEMENT OF PROBABLE CAUSE

2. On or about March 3, 2019, the Hawaii Sheriff's Office forwarded an anonymous tip to the United States Secret Service detailing a subject traveling from Los Angeles, CA to Honolulu, HI via United Airlines flight 1170. The tip indicated that the subject was transporting a large quantity of counterfeited Federal Reserve Notes (FRNs). The subject was identified as "Elvis Pres LEE," (hereafter "LEE"), with a date of birth in 1989.

3. United Airlines confirmed that LEE was on flight 1170, and was due to arrive in Honolulu the evening of March 3, 2019.

4. In response to the anonymous tip, I contacted the Hawaii Sheriff's Office for assistance identifying LEE. Hawaii Sheriff's Office Deputy Steven Tao, USSS Special Agent David Carruthers, and I responded to the Honolulu Airport, where we identified LEE in the baggage claim area on March 3, 2019.

5. SA Carruthers and I approached LEE and asked him for identification. LEE produced a current California driver's license which displayed the name "Elvis Pres LEE" with a date of birth in 1989 and a photograph that matched LEE.

6. LEE verbally agreed to a consensual search of his belongings and signed a consent form. LEE personally opened his luggage and revealed its contents. LEE's wallet was laying on the bench next to his luggage. SA Carruthers

asked for consent to search the wallet and LEE verbally consented to the search of his wallet. SA Carruthers identified eighteen (18) bleached, genuine \$1 FRNs in LEE's wallet, along with a counterfeit \$100 FRN displaying serial number CF45764545C.

7. Each genuine FRN bears a unique serial number. A query of a Secret Service database revealed the counterfeit FRN bearing serial number CF4576545C was found to be previously of record with the Secret Service. Counterfeit FRNs bearing that serial number had been recovered 976 times in the past, which means that someone has attempted to pass or successfully passed counterfeit notes bearing this same serial number 976 times in the past. These notes were primarily passed in the Sacramento, CA area, which is where LEE currently resides.

8. LEE opened his checked bag and revealed an HP ENVY 5052 printer displaying serial number M2U85-80021.

9. After we discovered the above contraband items, SA Carruthers read LEE his *Miranda* rights, which LEE waived both verbally and in writing. LEE told us that he knew the \$100 FRN was counterfeit and that the (18) eighteen bleached \$1 FRNs were part of his counterfeit U.S. currency manufacturing process.

10. LEE stated that he was traveling to Hawaii to use methamphetamine with a local narcotics dealer. LEE stated that the drug dealer had agreed to

purchase LEE's plane ticket in exchange for LEE teaching the drug dealer how to manufacture counterfeit FRNs.

11. LEE consented to a search of his cell phone, verbally and in writing, via Secret Service Form 1922B. LEE unlocked the device and showed me his text messages and Facebook Messenger messages. I identified a text message that LEE had sent to his aunt, which described LEE's manufacturing process for counterfeit FRNs. In reference to the \$100 counterfeit FRNs, LEE wrote the following: "\$40 a piece they pass the Pen, they pass the UV light, and they have the watermark, and Security strip with the 100USA written on it. The Machine like bill exchange will accept them."

12. LEE agreed to meet SA Carruthers and me a few days later, at the United States Secret Service Honolulu Field Office on March 7, 2019. We told LEE that he was free to leave, and he left the airport.

13. On March 7, 2019, LEE met SA Carruthers and me at the Honolulu Field Office, as scheduled. SA Carruthers read LEE his *Miranda* rights again, which he waived verbally and in writing via Secret Service Form 1737C. LEE admitted to manufacturing counterfeit \$100 FRNs with a friend in California. LEE stated that he had previously created multiple batches of the FRNs, of 5 to 10 notes per batch. LEE stated that he used a highlighter on the printed security strip in order to enable the FRNs to pass a UV [Ultraviolet Light] test. He further stated

that he created a watermark for the FRNs on a piece of tissue paper and inserted the watermark into the note. LEE stated that he bought a template for the \$100 counterfeit FRN displaying serial number CF45764545C on the dark web. LEE stated that he utilized the editing program "Photoshop" to improve the template's aesthetics. LEE stated that he obtained the HP ENVY printer in his luggage from a friend. LEE stated the Printer was picked up from his friend's house, who he partnered with to manufacture counterfeit currency. LEE stated that he had knowledge of the printer for several months, but he could not remember how many bills had been printed on it. LEE stated that he knew that the printer he had to use to manufacture FRNs had to be an HP printer in order to prevent a dot matrix pattern from appearing on the note, which would make it not look genuine. SA David Carruthers asked LEE if the forensics on the counterfeit \$100 FRN with serial number CF45764545C would match the printer in his luggage, and LEE responded that it probably would.

14. LEE consented to a search of his personal cell phone, a Samsung Galaxy Note 8, verbally and in writing. LEE personally opened an application on his phone named Telegram using his fingerprint as the password. LEE then opened a text conversation between his girlfriend and himself for me to view. In this text conversation, LEE was debating with his girlfriend whether he should meet with the Secret Service after our interaction at the airport. LEE discussed leaving the

island to avoid charges and stated “I can get a Fake ID and just board that way, \$100 That is what I was thinking of doing!”

15. Based on the foregoing, I believe that LEE poses a flight risk.

16. LEE then drafted a written statement that acknowledged his involvement in and knowledge of manufacturing and uttering counterfeit FRNs.

17. LEE was then told that he was free to leave, and he left the Field Office.

18. On March 15, 2019, Honolulu Police Officer Ashely Heffelfinger responded to the American Eagle Outfitters clothing store located in the Ala Moana Center in reference to a counterfeit FRN case. The suspect, later identified as LEE, uttered (4) four counterfeit \$100 FRNs displaying the serial numbers KB83729583, CF45864545C, CH01788588H, and HK06512233C at 1753 hours to purchase multiple clothing items. All (4) four FRNs recovered were printed on bleached genuine \$1 FRNs. The counterfeit FRNs did not have attempts to mimic the security strip or a watermark that are found on genuine currency.

19. A query of a Secret Service database revealed the counterfeit FRN bearing serial number KB83729583 was found to be previously of record with the Secret Service, and has been passed (18) eighteen previous times in the Sacramento, CA area with the most recent on record being on February 26, 2019.

20. The counterfeit FRN bearing serial number CF45864545C is the same serial number that was found on the counterfeit FRN recovered on March 3, 2019 from LEE's wallet. A query of a Secret Service database revealed the counterfeit FRNs bearing this serial number have been passed 976 times in the past, with the highest concentration of passes in the Sacramento, CA area.

21. A query of a Secret Service database revealed the counterfeit FRN bearing serial number CH01788588H was found to be previously of record with the Secret Service and had been passed 939 times, with a concentration of passes in the Sacramento, CA area. The last time CH01788588H was passed and recorded by the Secret Service was on February 14, 2019.

22. A query of a Secret Service database revealed the counterfeit FRN bearing serial number HK06512233C was found not to be previously of record with the Secret Service.

23. The clothing items LEE purchased with counterfeit FRNs from the American Eagle Outfitters clothing store located at the Ala Moana Center were returned later the same day for genuine currency at a different American Eagle Outfitters location at Pearlridge Center. When LEE returned the items at the Pearlridge Center location, he was required to provide identification. The receipt for the returned items displayed the name Elvis LEE residing at an address on

Circuit Drive, in Roseville, CA. This identification matches the California drivers licensed provided to the Secret Service on March 3, 2019 at the Honolulu Airport.

24. Honolulu Police Department (HPD) Officer Christine Thomas provided me a copy of the police report, surveillance, and allowed me to examine the counterfeit FRNs recovered from American Eagle. After viewing the surveillance footage, I was able to immediately recognize the suspect as Elvis Pres LEE by his physical attributes and the tattoos on his right arm. I observed LEE on the overhead surveillance interacting with the Retail Manager Cassandra Peele, who is a relative of LEE, making a cash purchase for several items of clothing. LEE kept his face down as he walked around the store, especially when walking through the entrance of the store in an attempt to hide his face. Peele processed the transaction with LEE at the main cash register. When LEE handed over the FRNs, Peele did not test the FRNs for authenticity. The FRNs were immediately deposited into the cash register by Peele.

25. On March 20, 2019, I spoke with Placer County Probation Officer Craig who advised that LEE currently has two active \$50,000 felony arrest warrants that were filed by the Placer County Sheriff's Office. LEE began probation on August 29, 2017 for felony charges of grand theft while out on bail and possession of narcotics with the intent to distribute. The last time LEE made contact with a Placer County Probation Officer was on January 26, 2019, via


email. LEE's probation requires he makes contact with his probation officer every two weeks, which he has failed to do. Accordingly, I believe that LEE poses a flight risk.

Respectfully submitted,



KARL VON ALLMEN
Special Agent
U.S. Secret Service

Subscribed and sworn before me this 21st day of March, 2019. Based upon the foregoing, the undersigned Judicial Officer finds that there is probable cause to believe that defendant above-named committed the crimes charged in the Criminal Complaint, this 21st day of March, 2019.



HON. KEVIN S. CHANG
United States Magistrate Judge Kevin S.C. Chang
District of Hawaii

